

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐ FEPA☐ EEOC

560-2018-00093

**Missouri Commission on Human Rights**

State or local agency, if any

Name (Indicate Mr., Ms., Mrs.)

John N. Castellano III

Home Phone No. (Incl Area Code)

314-518-1655

Date of Birth

06/18/1973

Street Address

5253 Bonita

City, State and Zip Code

St. Louis, MO 63109

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

City of St. Louis/St. Louis Sheriff's Department

No. Employees, Members

15+

Phone No. (Include Area Code)

314-622-4131

Street Address

1114 Market St., Suite 112

City, State and Zip Code

St. Louis, MO 63101

Name

See Below

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and Zip Code

DISCRIMINATION BASED ON (Check Appropriate Box(es).)

☒ RACE☒ COLOR☐ SEX☐ RELIGION☐ NATIONAL ORIGIN☒ RETALIATION☐ AGE☐ DISABILITY☐ OTHER (Specify below.)

Other:

DATE(S) DISCRIMINATION TOOK PLACE  
Earliest Latest

8/7/17

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I have been an employee of the Sheriff's Department since August 9, 1998. I am a Caucasian male. In September/October 2016, I put in my application to be considered for promotion to sergeant. According to the Manual of Policy, Rules and Regulations promulgated by the Sheriff, promotions are from eligibility lists based upon competitive testing.

On or about August 7, 2017, Danny McGinnis (African American male) was promoted to sergeant without any competitive testing. He is less qualified for the position. Prior to this promotion, another African American deputy was promoted to sergeant without any competitive testing, who was not qualified for the promotion according to the Department's own Manual of Policy, Rules, and Regulations. I filed a Charge of Discrimination related to this promotion on June 12, 2017 at Charge No. 560-2017-01475. I was discriminated against because of my race when an African American employee of the Sheriff's Department was promoted over me to the rank of sergeant. I was also

I want this charge filed with both EEOC and the State or Local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm

The best of my  
SIGNATURE

EXHIBIT

2

It is true to

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

I declare under penalty of perjury that the above is true and correct.

10/5/17

Date

X. John N. Castellano III

Charging Party Signature

2017 OCT 11 AM 5:26

ST LOUIS DISTRICT

RECEIVED  
EEOC

DFT - 000810

Exhibit 25

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State or local agency, if any

THE PARTICULARS ARE (Continued from previous page):

retaliated against for filing a Charge of Discrimination when I was not promoted.

Upon information and belief, African American employees of the Sheriff's Department have been given pay raises that have not been given to Caucasian employees.

**Supervisors Discriminating Against Me:**

Vernon Betts, Sheriff

1114 Market St., Suite 112, St. Louis, MO 63101 314-622-4131

RECEIVED  
EEOC  
ST LOUIS DISTRICT  
2017 OCT 11 AM 5:26

I want this charge filed with both EEOC and the State or Local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to

I declare under penalty of perjury that the above is true and correct.

The best of my knowledge, information and belief.  
SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

Date

Charging Party Signature

DET - 000811